



June 5, 2018

**Filed Electronically**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re:    *Written Ex Parte Presentation***  
**GN Docket Nos. 17-183 & 18-122**

Dear Ms. Dortch:

Globecast America, Inc. ("Globecast"), which provides a wide variety of television services (including extensive C-band uplink and downlink services for both broadcast and cable content and information providers) to U.S. broadcasters and programmers, strongly urges the Commission to ensure continued availability of high quality C-band satellite services as part of any changes it considers to the use of the 3.7-4.2 GHz frequency band. In addition, to gain a more complete understanding of the robust use and ubiquitous deployment of C-band satellite facilities, the Commission should modify its C-band receive earth station registration procedures by eliminating or reducing the filing fee and establishing a streamlined mechanism that allows multiple receive antenna sites to be included in a single filing.

As a number of satellite industry members have emphasized in their filings in this proceeding, C-band satellites play an indispensable role in the nation's communications infrastructure, including serving as the backbone for distribution of video and audio programming enjoyed by U.S. consumers in their homes, cars, and workplaces around the country.

Globecast, for example, distributes several broadcast and cable television channels to thousands of C-band receive earth stations throughout the United States and other countries within the Americas. Ongoing access to adequate C-band satellite spectrum and protection from interference is critical to Globecast and our customers like Hallmark, Scripps, In-Demand, Sinclair Broadcasting, Fox and others to allow continued high quality delivery of news, sports and entertainment programming, as there is no alternative transmission mechanism that matches the reliability and reach of C-band satellites. Without such spectrum and protections in place, the impact to my company and its customers would be a significant reduction in reach for areas that are not served by any kind of fiber connectivity or other technology in a cost-effective manner. Furthermore, U.S. consumers would be deprived of the availability of diverse news and entertainment programming through means other than direct-to-home Ku-band satellite and highly urban-centric service providers that can provide video services to consumers at scale.



Consistent with the Commission's rules, the vast majority of the C-band receive-only earth stations that are part of this ubiquitous network are unregistered. As the registration of C-band receive earth stations has not been required for decades, most newer and smaller cable operators and downlink sites have not registered, nor have they been required to register their antennas. As a result, the Commission does not have accurate information regarding the total number or specific locations of the thousands or even tens of thousands of C-band receive earth stations in use today. Google's assertion that many of the registered earth stations are no longer in operation may be factually correct, but is not necessarily relevant as the majority of existing C-band downlink sites were deployed since the rules for registration expired.

Under the existing regulatory framework, registration of receive earth stations is cost-prohibitive for many providers. While the Commission has waived the coordination report requirement, the rules still require payment of a \$435 per site application fee to the Commission. These costs quickly add up for operators with significant numbers of receive earth stations in service, and can be an obstacle to registration for smaller entities with very limited operating budgets, even if their earth station sites number only in the double digits.

Compiling and submitting all of the data required by the registration process is also unduly burdensome, representing a serious strain on the limited personnel resources of smaller companies like my own as well as its smaller video programming customers that often serve specific ethnic and niche consumers who rely upon these programming services for information and entertainment tailored for their respective interests. Streamlining the information requirements to allow submission of receive earth stations at multiple sites via a single registration filing would minimize these burdens and encourage more receive earth station operators to complete the registration process. Maximizing the number of registered earth stations will give the Commission the tools needed to protect C-band satellite operations, ensuring that U.S. consumers who currently receive and rely on news, sports and entertainment programming throughout the United States can continue to do so for many years to come.





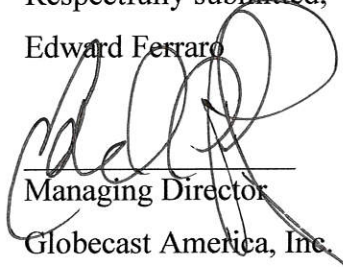
The Commission cannot make sound decisions regarding C-band spectrum if it does not have the facts regarding existing satellite operations in these frequencies. In order to obtain that essential information, the Commission must promptly revise its registration procedures to allow receive earth station locations to be identified without the substantial costs – both financial and administrative – that are imposed under the current Commission registration rules.

In connection with the FCC's and market's interest in spurring the deployment of 5G services, Globecast understands the national interest in facilitating access to spectrum, possibly in the mid-band, by a broad range of service providers. Nevertheless and in no way in derogation of the aforementioned interest, we strongly believe that incumbent users of the mid-band--and particularly those providing C-Band service to a wide range of customers and consumers-- require continued assurance of quality, reliability and the ability to maintain an interference-free environment in the band. We believe the satellite service providers are best situated to protect these operational requirements and to allow us the ability to work with them as reliable providers of a diversity of news, information and entertainment.

In summary to ensure continued national availability of news, sports and entertainment programming to rural households throughout the United States, the Commission must ensure ongoing access to adequate C band satellite spectrum and protection from interference. It is for these reasons, we support the proposal made by Intelsat/Intel/SES Global.



Respectfully submitted,  
Edward Ferraro



Managing Director  
Globecast America, Inc.

**Your channel in every format, every screen, every region.**